



Republic of Serbia
OFFICE OF THE WAR CRIMES
PROSECUTOR

Ref. KTO. no. 2/15
Belgrade, 21 January 2016

HIGHER COURT IN BELGRADE
War Crimes Department

B E L G R A D E

Pursuant to my authority under article 331 (1) and (2) in re article 43 (2.5) of the *Criminal Procedure Code* (*RS Official Gazette*, nos. 72/2011, 101/2011, 121/2012, 32/2013, 45/2013), and articles 3 and 4 of the *Act on Organization and Competence in War Crimes Proceedings* (*RS Official Gazette*, nos. 67/2003, 135/2004, 61/2005, 101/2011, 104/2009, 101/2011 – *Other Acts*); and due to the existence of reasonable suspicion, I raise this

INDICTMENT

Against the following:

1. AA

Personal details:

Son of AB and AV née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

2. AG

Personal details:

Son of AD and AĐ née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

3. AE

Personal details:

Son of AŽ and AZ née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

4. AI

Personal details:

Son of AJ and AK née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

5. AL

Personal details:

Son of ALJ and AM née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

6. AH

Personal details:

Son of ANJ and AO née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

7. AP

Personal details:

Son of AR and AS née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

8. AT

Personal details:

Son of AĆ and AU née ...

Citizen identity number: ...

Date/place of birth: ...

Current residence: ...

Statement of reasons:

The events relevant to this indictment took place in the course of an internal (non-international) armed conflict that existed in the territory of Bosnia-Herzegovina in the period between April 1992 and December 1995. Parties to the conflict were the Republic of Srpska's Army ("RSA") and Ministry of the Interior ("RSMoI") on one side, and the BH Army ("BHA") and Ministry of the Interior ("BHMoi") on the other.

At all times relevant to this indictment, **the accused:**

AA, in his capacity as commander of the 2nd Platoon – part of the 1st Company operating within the Jahorina Training Centre – part of the RSMoI Special Police Brigade (hereinafter: "Jahorina Training Centre");

AE, AI, AL, AN and **AP**, acting as members of the said Platoon; and

AG and **AT**, acting as members of the 1st Platoon – part of the Jahorina Training Centre's 1st Company,

Committed grave breaches of international law as set out in the following:

Article 3 (1.a) of the Geneva Convention on the Protection of Civilian Persons in Time of War, adopted on 12 August 1949 ("Geneva Convention IV"); and

Article 4 (1) and (2.a) of the Protocol Additional to the Geneva Conventions on the Protection of Victims of Non-International Armed Conflicts ("Protocol II").

In the aftermath of the military operation known as "Krivaja 95", which was underway from 6 July to 11 July 1995, the territory of the so-called "Srebrenica enclave" was placed under the RSA and RSMoI control; parallelly underway were a mass exodus of women, children and elderly men – Bosnian Muslim civilians from the "enclave", alongside the arrests of thousands of men – Bosnian Muslim civilians and BHA members, most of whom had laid down their arms and offered no resistance.

On 14 July 1995, inside, before and closely around the warehouse of the agricultural community in village Kravica ("Kravica warehouse"), municipality Bratunac, BH, the herein accused individuals launched a campaign of terror against the civilian population and persons who were not directly involved in the hostilities – Bosnian Muslim men.

Specifically, **the accused, AA**, ordered and personally engaged in the killing of civilians. He issued such killing orders to the 2nd Platoon members, including the accused: AE, AI, AL, AN and AP, as well as to some members of

the 1st Platoon – part of the Jahorina Centre's 1st Company, including the accused: AG and AT. Meanwhile the accused: AG, AE, AI, AL, AP, AN and AT engaged in the killing of civilians, namely in mass liquidations of several hundred men – Bosnian Muslim civilians (hereinafter: civilians).

Thus:

In the night before 14 July 1995, acting upon the orders of the accused, AA, and provisionally placing themselves under his command, members of the 2nd Platoon and some of those of the 1st Platoon – part of the Jahorina Centre's 1st Company, deployed themselves around the warehouse premises, which were at the time filled with a large number of captured civilians. As of the previous day onwards, a number of other RSMoI members, including FNU LNU members of the Jahorina Training Centre's 1st Company, had engaged in the liquidation of those inside, on whom they discharged bursts of automatic gunfire and threw hand grenades through the warehouse openings, thereby taking an undetermined number of innocent lives.

In the early morning hours of 14 July 1995, the accused, AA, ordered and personally took part in the liquidations. Meanwhile, acting in compliance with those orders, the accused: AG, AI, AL, AN, AP and AT, aided and abetted by other FNU LNU members of the 1st and 2nd Platoons – part of the Jahorina Centre's 1st Company, **carried out the liquidation** of approximately one hundred surviving civilians, including a number of wounded persons.

The accused: AA and AG first called a group of the captives out to the concrete ground in front of the warehouse, promising that nothing bad would happen to them; once outside, the captives were forced to sing Chetnik songs under the threat of being shot.

In subsequence, the accused, AA, ordered the 1st Platoon members who were present at the site – including the accused: AG, AE, AI, AL, AN, AP and AT – to make up a firing squad and join him in the execution of the group. All of the accused complied with the order and opened sustained gunfire from their machine guns and automatic rifles.

Finally, those who were still giving signs of life were shot dead by single bursts of fire. Positioned at a close distance, AA shot from his CZ gun, AG from his Scorpion, and AE and AN from their automatic rifles.

The executions persisted throughout the whole day and into the evening hours of 14 July 1995. On several occasions, before and around the Kravica warehouse, the accused, AA, ordered and personally engaged in mass liquidations. Acting under his command and in compliance with his orders, the accused: AG, AE, AI, AL, AN and AP, aided and abetted by other unidentified members of the Jahorina Centre's 1st Company, carried out mass liquidations of the civilians. Previously captured by other unidentified RSMoI

and RSA members, multiple groups of victims had been successively transferred on foot, buses and trucks to the warehouse, where they got handed over to these accused and submitted to a firing campaign that resulted in the deaths of several hundred civilians.

The above-described acts on the part of these accused individuals and other RSMoI members, including FNU LNU members of the Jahorina Training Centre's 1st Company, resulted in the deaths of at least one thousand three hundred and thirteen (1,313) identified civilians, whose remains have been exhumed at a number of sites in Bosnia-Herzegovina: Glogova, Ravnice, Hangar Kravica, Zeleni Jadar, Zalazje, Pusmulici, Blječeva and Budak. The victims' names, with their fathers' names in parentheses, are as follows:

1 – 1,313*

By acting in the above-described manner, these accused individuals committed the criminal offence under article 142 (1) (war crime against civilian population) in re article 22 (co-perpetration) of the FRY Criminal Code.

**Miojub Vitorović
DEPUTY WAR CRIMES
PROSECUTOR**

* Personal details of the victims (1 – 1,313) have been removed in line with the *Rules of Personal Data Anonymization in OWCP Indictments*.